

## BOY SCOUTS OF AMERICA

DATE October 26, 1987FULL NAME Robert Joseph Vehoski SOCIAL SECURITY NUMBER [REDACTED]  
(No initials if you can possibly get full name)ADDRESS [REDACTED]CITY Detroit STATE Michigan ZIP CODE 48228DATE OF BIRTH 4-22-37 (This is important and should be exact)

APPROXIMATE AGE \_\_\_\_\_ (To be used ONLY when date of birth is not known)

RELIGION Catholic NATIONALITY \_\_\_\_\_OCCUPATION Works for Michigan Bell Telephone CompanyEDUCATION High SchoolWEIGHT \_\_\_\_\_ HEIGHT \_\_\_\_\_ RACE WhiteCOLOR OF HAIR Light Brown COLOR OF EYES \_\_\_\_\_

OUTSTANDING CHARACTERISTICS OR INTERESTS \_\_\_\_\_

MARRIED OR SINGLE Married CHILDREN [REDACTED]

(Number, ages, and names, if possible)

NAME OF SPOUSE [REDACTED]SCOUTING CONNECTIONS:

<u>UNIT #</u>	<u>CITY</u>	<u>STATE</u>	<u>POSITION</u>	<u>DATE REGISTERED</u>	<u>DATE RESIGNED</u>
S-526	Detroit	Michigan	Scoutmaster		

SPECIAL RECOGNITION \_\_\_\_\_

## SUSPENDED OR DENIED REGISTRATION FOR FOLLOWING REASONS:

Plead guilty to attempted Criminal Sexual Conduct II; placed on probation.

SPECIFY THE FACTS WHICH LEAD YOU TO RECOMMEND DENIAL OF REGISTRATION AND LIST ATTACHED SUPPORTING DOCUMENTS (STATE ONLY KNOWN FACTS, NOT RUMOR, CONJECTURE OR SPECULATION):

See Order of Probation.

CONFIDENTIAL

NOV 2 1987

F. STARON

RS-509

4/14/83-nah

NOV 6 '87

JOSEPH L. ANGLIM

Signed Thomas L. Linn

SCOUT EXECUTIVE

Council Detroit Area, #262

November 10, 1987

Mr. Joseph W. Wyckoff  
Scout Executive  
Detroit Area Council, No. 262

PERSONAL AND CONFIDENTIAL

SUBJECT: Robert Joseph Vehoski

Dear Joe:

Thank you for the detailed information sent concerning the above Scouter.  
This case has been reviewed with our attorney and is now on our permanent  
Confidential File.

Sincerely,

Paul Ernst, Director  
Registration Service

PE/mdw

cc: East Central Region

READY TO FILE  
NOV 10 1987  
ERIN O'RILEY

CONF012952

THE RECORDER'S COURT  
OF THE CITY OF DETROIT  
ORDER OF PROBATION

P.O. \_\_\_\_\_

Div. \_\_\_\_\_

No. Charge No. \_\_\_\_\_

People of the State of Michigan,  
Plaintiff

vs.

Complain. \_\_\_\_\_

ROBERT J. VEHOSEKI

Defendant

Address \_\_\_\_\_

Phone \_\_\_\_\_

Address	D.O.B.	Phone	S.S. #
_____	<u>4/22/37</u>	_____	_____

At a session of court held in Detroit on the 26 day of NOV 1984, defendant was convicted of having committed the crime of ATT CSC 2A.

IT IS THEREFORE ORDERED: That defendant on this 26 day of NOVEMBER 1984 be placed on probation for a term of FIVE YEARS.

The conditions of said probation are as follows:

1. That probationer shall serve first NONE of probation period in ☐ Detroit House of Correction ☐ Wayne County Jail
2. That probationer shall pay the fine and/or costs as follows:

16.50 / month

TOTAL  
FINES  
& COSTS

\$ 165 / YR

3. That probationer shall make restitution as follows: NONE

☐ To be determined.

(a) Court appointed attorney \$ NONE

TOTAL  
RESTITUTION

\$ \_\_\_\_\_

4. ☐ Family Support

All Costs and Restitution are payable thirty (30) days prior to expiration date of this Order unless otherwise noted.

☐ Wage Assignment NOT TO BE ALONE WITH ANY CHILD EXCEPT OWN.

5. Special Instructions: RECORDER'S CRT PSYCHIATRIC CLINIC PROGRAM  
THERAPY AS DIRECTED; GROUP THERAPY FOR SEX OFFENDERS  
PAYS COST OF THERAPY FOR COMPLAINT OR ANY MEMBER OF  
FAMILY. NO LONGER BE INVOLVED WITH SCOUTS OR LITTLE LEAG.  
OR SIMILAR ORGANIZATION

THE SPECIAL CONDITIONS OF PROBATION:

- A. Probationer shall not violate any State or Federal criminal law or any ordinance of any municipality, nor attempt to do so, nor make any preparation leading to the same.
- B. During the term of probation, Probationer shall not leave the State without the consent of the Court.
- C. Probationer shall make a report to the probation officer, either in person or in writing, weekly, or as often as the Court may require.
- D. Probationer shall cooperate at all times with the probation officer and conform to the following regulations and suggestions: To keep regular and reasonable hours; To avoid questionable associates and places; To seek and retain regular employment; To endeavor to accumulate some savings; To take advantage, if possible, of educational and other facilities for self-improvement. In case of doubt, consult the probation officer.

[Signature]  
Judge, Recorder's Court

Copy served and receipt thereof acknowledged

X Robert Vehoski  
Defendant's Signature

Date NOVEMBER 26 1984

COURT COPY

CONF012953

October 13, 1987

Mr. Thomas D. Trainor  
Director of Business Operations  
Detroit Area Council, No. 262

PERSONAL & CONFIDENTIAL

SUBJECT: Robert J. Vehoski

Dear Tom:

I hate to bother you again, but I still need the Confidential Record Sheet for Mr. Vehoski. I am enclosing another one so that you may complete this to the best of your ability.

The completion of this form will give us all the information which we need for refusal of registration of Mr. Vehoski should an attempt be made in another council.

Thank you for your help in completing this file.

Sincerely,

Paul Ernst, Director  
Registration Service

eak

Encl.

cc: East Central Region  
Joseph W. Wyckoff, Scout Executive, Council No. 262

READY TO FILE  
OCT 14 1987  
ERIN O'RILEY

CONF012954

August 10, 1987

Mr. Thomas D. Trainor  
Director of Business Operations  
Detroit Area Council, No. 262

PERSONAL & CONFIDENTIAL

SUBJECT: Robert J. Vehoski

Dear Tom:

I have in my possession all of the material we need for refusing registration for the above-named individual. The only thing I am missing is a Confidential Record Sheet so I may identify Mr. Vehoski.

I am enclosing a sheet which I would like to have completed to the best of your ability. This will enable us to identify Mr. Vehoski should he try to register in some other location. It will also complete our file and enable us to refuse registration should an attempt be made through any council.

Thank you for your help.

Sincerely,

READY TO FILE  
AUG 10 1987  
ERIN O'RILEY

Paul Ernst, Director  
Registration Service

eak

Encl.

cc: East Central Region  
Joseph W. Wyckoff, Scout Executive, Council No. 262

CONF012955

Detroit  
Area  
Council  
Boy Scouts  
Of  
America

1776 W. Warren  
Detroit, MI  
48208  
313 - 897-1965



Officers

President

Alfred S. Warren

First Vice President

James H. McNeal

Vice Presidents

Betty Jean Awrey

Bennett E. Bidwell

John H. Burdakin

Stephen E. Ewing

Dr. Arthur Jefferson

John Rakolta, Jr.

Scout Commissioner

Dr. Samuel J. Prisk

Treasurer

Irving Rose

Assistant Treasurers

Wardell Croft

George G. Johnson

Frederick G. Ruffner, Jr.

Counsel

May 20, 1987

Mr. David K. Park, S400  
Boy Scouts of America  
1325 Walnut Hill Lane  
Irving, Texas 75038-3096

Dear David:

Enclosed you will find a Summons and Complaint in the case of

*S.E. Jones*  
[Redacted]  
Boy Scouts of America  
[Redacted]  
United Methodist Church.

I am also enclosing copies of everything we have in our file on Robert J. Vehoski.

I would appreciate it if you would notify us of who will be handling this on behalf of the Boy Scouts of America as soon as possible.

If you have any questions, please feel free to contact me.

Sincerely,

*Thomas D. Trainor*

THOMAS D. TRAINOR  
Director of Business Operations

*CALL CHUCK*

*WHY DELAY*

*NOTHING IN*

*WRITING DATE 5-27-87*

*PER PAGE WILL SEND MTL.*

*has now changed churches*

*Added to CF file.  
Do not show any  
registration  
5/27/87  
cm.*

# FILE WITH ASSIGNMENT CLERK ONLY

PRAECIPE FOR MOTION AND  
ORDER/JUDGMENT

THE CIRCUIT COURT FOR THE COUNTY OF WAYNE  
STATE OF MICHIGAN

Plaintiff

v.  
ROBERT J. VEHOSEKI, MARY ANN VEHOSEKI  
JOE WYCKOFF, TOM TRAINER, BOY SCOUT  
OF AMERICA, JUANITA FERGUSON, WILLIAM  
S. FORD MEMORIAL UNITED METHODIST  
CHURCH,

Defendant

5/12/87 STEPH  
VS VEHOSEKI ROBERT J

Criminal No.

TO THE ASSIGNMENT CLERK: Please place Plaintiff's/Defendant's (strike one) Motion for (state nature  
of Motion in brief form)

Motion for Appointment of Next Friend

On the motion calendar for (date)

This motion is to be heard by JUDGE

TO COURT CLERK: Have the following Order/Judgment completed and signed by Judge and check 1 or 2  
below, whichever is applicable.

## ORDER/JUDGMENT

Dated: , 19

- ☐ 1. IT IS HEREBY ORDERED THAT the aforesaid motion be and the same is hereby DENIED.
- ☐ 2. IT IS HEREBY ORDERED THAT the aforesaid motion be and the same is hereby GRANTED,  
and it is FURTHER ORDERED AND ADJUDGED

Circuit Judge

APPROVED AS TO FORM AND SUBSTANCE  
BY COUNSEL FOR:

FRED L. GIBSON (P39530)  
Plaintiff's Attorney

Telephone No.

PLAINTIFF

Defendant's Attorney

DEFENDANT

Telephone No.

Dated:

(List additional attorneys on other side)

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

[REDACTED]  
Plaintiff,

vs.

[REDACTED] VS VEHOSKI ROBERT J

ROBERT J. VEHOSKI, MARY ANN  
VEHOSKI, JOE WYCKOFF, TOM  
TRAINER, BOY SCOUTS OF AMERICA,  
JUANITA FERGUSON, WILLIAM S.  
FORD MEMORIAL UNITED METHODIST  
CHURCH,

Defendants.

GOLDPAUGH & ASSOCIATES, P.C.  
BY: FRED L. GIBSON (P39530)  
Attorney for Plaintiff

[REDACTED]  
Birmingham, MI 48010  
[REDACTED]

MOTION FOR APPOINTMENT OF NEXT  
FRIEND FOR PLAINTIFF - MINOR 14 YEARS OR OLDER

[REDACTED] a minor 14 years of age and  
over, to wit 14 years of age, having no conservator of his  
estate, and desiring to commence an action in this court  
against Robert J. Vehoski, Mary Ann Vehoski, Tom Trainer,  
Joe Wyckoff, Juanita Ferguson, Boy Scouts of America and  
William S. Ford Memorial United Methodist Church for Assault  
and Battery, False Imprisonment, Intentional/Negligent  
Infliction of Mental Distress and Negligence moves that  
[REDACTED] who resides at [REDACTED] Detroit, MI  
48228, be appointed next friend for purposes of commencing  
and prosecuting this action.


LAW OFFICES GOLDPAUGH & GORNO, P.C., 4733 TELEGRAPH ROAD, SUITE 175, BIRMINGHAM, MI 48010 (313) 432-1200

CONF012958

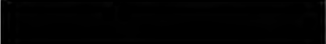


The consent of [REDACTED] to act as next friend  
is attached.

GOLDPAUGH & ASSOCIATES, P.C.

  
*Fred L. Gibson*

FRED L. GIBSON (P39530)  
Attorney for Petitioner

  
Birmingham, MI 48010

DATED: May 11, 1987

LAW OFFICES GOLDPAUGH & ASSOC. P.C., 1733 TELEGRAPH ROAD, SUITE 375, BIRMINGHAM, MI 48010 (313) 433-1100

CONF012959

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

[REDACTED]  
Plaintiff, [REDACTED] [REDACTED]

vs. [REDACTED]

ROBERT J. VEHOski, MARY ANN  
VEHOski, JOE WYCKOFF, TOM  
TRAINER, BOY SCOUTS OF AMERICA,  
JUANITA FERGUSON, WILLIAM S.  
FORD MEMORIAL UNITED METHODIST  
CHURCH,

Defendants.

GOLDPAUGH & ASSOCIATES, P.C.  
BY: FRED L. GIBSON (P39530)  
Attorney for Plaintiff  
[REDACTED]

CONSENT

I, [REDACTED] hereby consent to be appointed  
next friend of [REDACTED] for purposes of commencing  
and prosecuting this action against Robert J. Vehoski, Mary  
Ann Vehoski, Tom Trainer, Joe Wyckoff, Juanita Ferguson, Boy  
Scouts of AMERICA, William S. Ford Memorial United Methodist  
Church.

DATE: 5-11-87 [REDACTED]

LAW OFFICES GOLDPAUGH & ASSOCIATES, P.C., 8733 TELEGRAPH ROAD, SUITE 378, BIRMINGHAM, MI 48016 (313) 431-1200

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

[REDACTED]  
Plaintiff,

vs.

VS. VEHOSKI ROBERT J

ROBERT J. VEHOSKI, MARY ANN  
VEHOSKI, JOE WYCKOFF, TOM  
TRAINER, BOY SCOUTS OF AMERICA,  
JUANITA FERGUSON, WILLIAM S.  
FORD MEMORIAL UNITED METHODIST  
CHURCH,

Defendants.

GOLDPAUGH & ASSOCIATES, P.C.  
BY: FRED L. GIBSON (P39530)  
Attorney for Plaintiff  
[REDACTED]

ORDER APPOINTING  
NEXT FRIEND FOR MINOR PLAINTIFF

At a session of said Court held in the City  
of Detroit, County of Wayne, State of Michigan  
on MAY 13 1987

PRESENT: HON. CYNTHIA D. STEPHENS  
CIRCUIT COURT JUDGE

The motion of [REDACTED], a minor over 14  
years of age, for appointment of [REDACTED] as next friend  
having been considered, the courts finds that [REDACTED] is  
competent and suitable to be appointed next friend [REDACTED]  
[REDACTED] and that [REDACTED] has consented to such  
appointment.

IT IS ORDERED that [REDACTED] be and is hereby  
appointed next friend of [REDACTED] for the purpose of  
commencing and prosecuting an action against Robert J.  
Vehoski, Mary Ann Vehoski, Joe Wyckoff, Tom Trainer, Boy

LAW OFFICES GOLDPAUGH & ASSOC., P.C., 1731 TELEGRAPH ROAD, SUITE 318, BIRMINGHAM, MI 35203 (205) 433-1200

CONF012961

Scouts of America, Juanita Ferguson, William S. Ford  
Memorial United Methodist Church for Assault and Battery,  
False Imprisonment, Intentional/Negligent Infliction of  
Mental Distress and Negligence.

CYNTHIA D. STEPHENS  
CIRCUIT JUDGE

Approved as to form:



A TRUE COPY  
JAMES R. KILLEEN  
CLERK

*George W. Shepley*  
DEPUTY CLERK

GOLDPAUGH & ASSOCIATES, P.C.

*Fred L. Gibson*  
FRED L. GIBSON (P39530)  
Attorney for Petitioner



DATE: 5-11-87



LAW OFFICES GOLDPAUGH & ASSOCIATES, P.C., 5735 TELEGRAPH ROAD, SUITE 378, BIRMINGHAM, AL 35210 (205) 433-1200

JURY FEE PAID

THIS DATE:

MAY 12 1987

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

[REDACTED]  
Plaintiff,

vs. [REDACTED]

ROBERT J. VEHOSEKI, MARY ANN  
VEHOSEKI, JOE WYCKOFF, TOM  
TRAINER, BOY SCOUTS OF AMERICA,  
JUANITA FERGUSON, WILLIAM S.  
FORD MEMORIAL UNITED METHODIST  
CHURCH,

Defendants.

GOLDPAUGH & ASSOCIATES, P.C.  
BY: FRED L. GIBSON (P39530)  
Attorney for Plaintiff  
[REDACTED]

There is no other civil action  
arising out of the same transaction or  
occurrence as alleged in this Complaint  
pending in this Court nor has any such  
action been previously filed and  
dismissed after having been assigned  
to a judge.

DEMAND FOR JURY

The Plaintiffs hereby request a  
Trial by Jury.

COMPLAINT

NOW COMES the Plaintiff, [REDACTED] a duly  
qualified and acting next friend of [REDACTED] a  
minor under the age of eighteen (18) years, under  
appointment for the purposes of this action by this court,  
by and through his attorneys, GOLDPAUGH & ASSOCIATES, P.C.,  
and in support of this Complaint states:

1. That Plaintiff, at all times pertinent hereto,  
was a resident of the City of Detroit, County of Wayne,  
State of Michigan.

2. That Defendants, Robert J. Vehoski and Mary Ann Vehoski (husband and wife) are residents of the City of Detroit, County of Wayne, State of Michigan, at [REDACTED]

3. That Defendants, Joe Wyckoff and Tom Trainer, are upon information and belief, residents of the City of Detroit, County of Wayne, State of Michigan.

Further, that Defendants were, at the time of the incidents set forth herein, employed by Defendant Boy Scouts of America - Detroit Area Council, in the following capacity:

Joe Wyckoff - Chief Operating Officer

Tom Trainer - Director of Business Operations.

4. That Defendant, Boy Scouts of America, is a youth organization, authorized to operate within the State of Michigan, and at all times pertinent hereto, conducted business within the City of Detroit, County of Wayne, State of Michigan, as the Detroit Area Council at [REDACTED]

5. That Defendant, Juanita Ferguson, is upon information and belief, a resident of the City of Detroit, County of Wayne, State of Michigan.

Further, that Defendant at all times pertinent hereto, was employed by Defendant William S. Ford Memorial United Methodist Church, in the capacity of Minister and Agent.

6. That Defendant, William S. Ford Memorial United Methodist Church, is a religious society authorized to operate within the State of Michigan, and at all times pertinent hereto, conducted business within the City of Detroit, County of Wayne, State of Michigan, at [REDACTED]

7. That, at all times pertinent hereto, Defendant, William S. Ford Memorial United Methodist Church, was the sponsor organization for Scout Troop #526.

Further that Scout Troop #526 was authorized to operate and was chartered by Defendant Boy Scouts of America, Detroit Area Council.

8. That, at all times pertinent hereto, Plaintiff was a dues paying member of Scout Troop #526.

9. That, at all times pertinent hereto, Defendant, Robert J. Vehoski, was authorized to fulfill the duties and responsibilities of scout leader for Scout Troop #526 by, through and under the direction, guidance and control of Defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America - Detroit Area Council, and William S. Ford Memorial United Methodist Church.

10. That on or about June 10, 1984, Defendant Robert J. Vehoski, Scout Leader, along with Scout Troop #526, of which Plaintiff was a member, camped out at Warren Dunes, Berrien County, State of Michigan. Further, this organized activity was accomplished with the assistance and approval of and under the guidance, supervision and control of Defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America - Detroit Area Council, and William S. Ford Memorial United Methodist Church.

11. that on or about May 27, 1984, Defendants, Robert J. Vehoski and Mary Ann Vehoski solicited and received the company of Plaintiff for a trip to Indiana to visit said Defendant's relatives.

12. That on or about March 1984, April 1984 and May 12, 1984, Plaintiff was an overnight guest, due to the express invitation of Defendant Robert J. Vehoski and Defendant's son, at said Defendant's residence.

COUNT I

Assault and Battery

Plaintiff repeats and realleges paragraphs 1 through 12 as though set forth herein.

13. That on the dates and at the locations set forth in paragraph 10, 11 and 12, Defendant Robert J. Vehoski, without cause or justification, made an intentional assault on Plaintiff, in that said Defendant touched and massaged Plaintiff's back, thighs, buttocks and penis which was harmful and offensive to Plaintiff.

14. That the use of force was an assault done maliciously, willfully and wrongfully and with the design of causing Plaintiff to suffer fear, mental anguish and physical harm.

15. That the Defendant, Mary Ann Vehoski, owed a duty to Plaintiff while Plaintiff was an invited guest in her residence, in particular to maintain safe premises.

16. That notwithstanding said duty, Defendant Mary Ann Vehoski did violate same by:

a. Allowing her husband, Defendant Robert J. Vehoski, to commit the assaults and batteries upon Plaintiff;

b. Failing to warn Plaintiff about the dangerous propensity of Defendant Robert J. Vehoski to commit sexual assaults on minors.

c. Otherwise failing to use reasonable care to protect the safety of its guests.

17. That the Defendants, Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America - Detroit Area Council, and William S. Ford Memorial United Methodist Church owed a duty to Plaintiff, in particular to maintain a safe environment for members of Scout Troop #526.



18. That notwithstanding said duty, Defendants did violate same by:

a. Failing to properly select a leader for Scout Troop #526.

b. Failing to train and educate Plaintiff and other members of Scout Troop 526 to use reasonable care and caution when confronted with said acts by their scout leader.

c. Failing to properly supervise, direct and control the activities of Defendant scout leader of Troop #526.

d. And otherwise failing to take reasonable precautions and to protect the safety of its scouts.

19. That the Defendant Robert J. Vehoski was acting both as an individual and as a Scout Leader of the Boy Scouts of America and thus the Defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America and William S. Ford Memorial United Methodist Church are vicariously liable for the actions of Defendant Robert J. Vehoski. *Dany*

20. That as a direct and proximate cause of the negligence of all Defendants, Plaintiff has suffered severe headaches, physical illness, nightmares, and embarrassment, humiliation and mental anguish. Further that Plaintiff has expended sums of money for medical treatment and therapy.

WHEREFORE, Plaintiff prays for judgment against all defendants or against those defendants whom the court determines to be liable to the Plaintiff under the facts determined, in whatever amount greater than Ten Thousand (\$10,000.00) Dollars the trier of fact shall deem he be entitled to and granting such other relief as may be just and equitable.

1

COUNT II

False Imprisonment

Plaintiff repeats and reallege paragraphs 1 through 20 as though set forth herein.

21. That on the dates and at the locations set forth in paragraph 10, 11 and 12, Defendant Robert J. Vehoski, then and there imprisoned Plaintiff, by threat of force and assertion of authority causing Plaintiff to yield to that force.

a. by staying outside the door of the bedroom which Plaintiff was required to use while at Defendant Robert J. Vehoski's residence.

b. by utilizing the same tent, at the camp site, which Defendant Robert J. Vehoski had assigned Plaintiff.

c. by forcing Plaintiff to maintain secret the assaults and batteries committed by Defendant Robert J. Vehoski.

22. That The imprisonment was against the will of Plaintiff and was without any reasonable cause whatsoever.

23. That the Defendant, Mary Ann Vehoski owed a duty to Plaintiff while an invited guest in her residence, in particular to maintain safe premises.

24. That notwithstanding said duty, Defendant Mary Ann Vehoski, did violate same by:

a. allowing her husband, Defendant Robert J. Vehoski, to commit the act of false imprisonment against Plaintiff.

b. failing to use reasonable care to protect Plaintiff from those acts which she knew or should have known would result in the imprisonment of Plaintiff by her husband Defendant Robert J. Vehoski.

c. and otherwise failing to take reasonable precautions and to insure the freedom of Plaintiff.

25. That Defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America and William S. Ford Memorial United Methodist Church owed a duty to Plaintiff, in particular to maintain a safe, free environment for Plaintiff, a member of Scout Troop #526.

26. That notwithstanding said duty, defendants did violate same by:

a. Failing to properly select a leader for Scout Troop #526.

b. Failing to train and educate Plaintiff and other members of Scout Troop #526 to use reasonable care and caution when confronted with said acts by their scout leader.

c. Failing to properly supervise, direct and control the activities of defendant Scout Leader of Troop #526.

d. and otherwise failing to take reasonable precautions and to protect the safety and freedom of movement of its scouts.

27. That the Defendant Robert J. Vehoski was acting both as an individual and as a Scout Leader and thus the defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America and William S. Ford Memorial United Methodist Church are vicariously liable for the actions of Defendant Robert J. Vehoski. *Done*

28. That as a direct and proximate cause of the negligence of all defendants, Plaintiff has suffered severe headaches, physical illness, nightmares, and embarrassment, humiliation and mental anguish.

Further that Plaintiff has expended sums of money for medical treatment and therapy.

WHEREFORE, Plaintiff prays for judgment against all defendants or against those defendants whom the court determines to be liable to the Plaintiff under the facts determined, in whatever amount greater than Ten Thousand (\$10,000.00) Dollars the trier of fact shall deem to be entitled to and granting such other relief as may be just and equitable.

COUNT III

Intentional Infliction of Emotional Distress

or in alternative

Negligent Infliction of Emotional Distress

Plaintiff repeats and realleges paragraphs 1 through 28 as though set forth herein.

29. That on the dates and at the locations set forth in paragraph 10, 11 and 12, the acts of Defendant Robert J. Vehoski were extreme and outrageous in particular the:

- a. touching, rubbing and massaging of Plaintiff's back, thighs, buttocks and penis,
- b. false imprisonment,
- c. use of force, assertion of authority in committing the acts,
- d. violation of trust between Scout Leader and Scouts.

30. The acts of Defendant Robert J. Vehoski were intentional.

31. The acts of Defendant Robert J. Vehoski were of the type to cause any reasonable person severe emotional distress.

32. Plaintiff did suffer severe emotional distress as a result of Defendant Robert J. Vehoski's acts. Further said Defendant should have realized that his conduct involved an unreasonable risk of causing the distress and from the facts known to him should have realized that the distress might result in illness or bodily harm.

33. That the Defendant Mary Ann Vehoski owed a duty to Plaintiff while an invited guest in her residence, in particular to maintain an environment free from extreme and outrageous and negligent conduct.

34. That notwithstanding said duty said defendant did violate same by:

a. allowing her husband, Defendant Robert J. Vehoski, to commit the sexual acts causing the mental distress against Plaintiff.

b. failing to use reasonable care to protect Plaintiff from those acts which she knew or should have known would result in severe mental distress.

c. and otherwise failing to take reasonable precautions and to protect Plaintiff from the abnormal acts committed upon Plaintiff while an invited guest in her residence.

35. That defendants Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America and William S. Ford Memorial United Methodist Church owed a duty to Plaintiff, a member of Scout Troop #526.

36. That notwithstanding said duty, defendants did violate same by:

a. failing to properly select a suitable leader for Scout Troop #526.

b. failing to train and educate Plaintiff and other members of Scout Troop #526 to use reasonable care

and caution when confronted with said acts by their scout leader.

c. failing to properly supervise, direct and control the activities of defendant Scout Leader of Troop #526.

d. and otherwise failing to take reasonable precautions and to protect the mental and physical health of Plaintiff while a member of Troop #526.

37. That the Defendant Robert J. Vehoski was acting both as an individual and as a Scout Leader and thus, the defendants, Joe Wyckoff, Tom Trainer, Juanita Ferguson, Boy Scouts of America and William S. Ford Memorial United Methodist Church are vicariously liable for the actions of Defendant Robert J. Vehoski.

38. That as a direct and proximate result of the negligence of all defendants, Plaintiff has suffered severe headaches, physical illness, nightmares, and embarrassment and humiliation and mental anguish.

Further that Plaintiff has expended sums of money for medical treatment and therapy.

WHEREFORE, Plaintiff prays for judgment against all defendants or against those defendants whom the court determines to be liable to the Plaintiff under the facts determined, in whatever amount greater than Ten Thousand (\$10,000.00) Dollars the trier of fact shall deem to be entitled to and granting such other relief as may be just and equitable.

#### COUNT IV

##### Negligence

Plaintiff repeats and realleges paragraphs 1 through 38 as though set forth herein.

39. Prior to the commission of the wrongful acts by Defendant Robert J. Vehoski, each of the remaining defendants knew or should have known of said defendants propensity and/or predisposition to commit such wrongful acts.


40. Further, each of the defendants possessed the power to prevent, or aid in preventing, the commission of such wrongful acts by said defendant Robert J. Vehoski, and accordingly owed a duty to the Plaintiff to prevent, aid in preventing and/or attempt to prevent the commission of such wrongful acts.

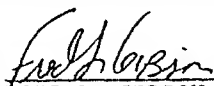
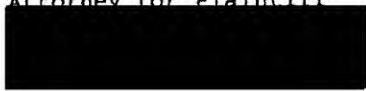
41. Notwithstanding such knowledge and powers, the defendants breached their duty by neglecting, failing and refusing to prevent, aid in preventing or attempt to prevent the commission of such wrongful acts.

42. As a direct and proximate result of such neglect, failure and refusal of the individual defendants, Plaintiff suffered the injuries previously set forth and Plaintiff is entitled to the damages previously set forth.

WHEREFORE, Plaintiff prays for judgment against all defendants or against those defendants whom the court determines to be liable to the Plaintiff under the facts determined, in whatever amount greater than Ten Thousand

(\$10,000.00) Dollars the trier of fact shall deem to be entitled to and granting such other relief as may be just and equitable.

  
GOLDPAUGH & ASSOCIATES, P.C.

BY:   
FRED L. GIBSON (P39530)  
Attorney for Plaintiff  


DATED: May 12, 1987



KEYWELL AND ROSENFELD

ATTORNEYS AT LAW

FREDERIC L. KEYWELL  
ROBERT S. ROSENFELD  
GARY A. GOLDBERG  
DAWN L. PHILLIPS  
GARY W. KLOTZ  
PHILLIP B. MAXWELL  
NORMAN E. GREENFIELD  
RICHARD E. SEGAL  
JEFFREY C. KAUFFMAN  
BURKE T. LEWIS  
LUCY R. BENHAM  
MARK T. BUTLER

TROY, MICHIGAN 48064

TELEPHONE

April 24, 1987

Fred L. Gibson, Esq.  
Goldpaugh & Associates

Birmingham, Michigan 48010

Re: Detroit Area Council,  
Boy Scouts of America

Dear Mr. Gibson:

The Detroit Area Council has no knowledge about whether or not the alleged incident involving Mr. Vehoski and [REDACTED] occurred during a Troop 526 meeting or at any Detroit Area Council function. Your statement that the "incident was able to occur in an atmosphere which evolved from the scoutmaster/scout relationship" suggests that, in fact, the alleged incident did not take place in the course of a Troop 526 or Detroit Area Council function. Given the Council's lack of knowledge about the details of the alleged incident, it can make no response to your inquiry.

Thank you for your attention to this matter.

Very truly yours,

KEYWELL AND ROSENFELD

Gary W. Klotz

GWK:car

cc: J. Wyckoff  
T. Trainor

CONF012975

LAW OFFICES  
GOLDBAUGH & ASSOCIATES, P.C.

JOHN J. GOLDBAUGH  
FRED L. GIBSON  
VICTOR RUBIN-WAXENBERG  
OF COUNSEL  
PETER P. BUGNICK

BIRMINGHAM, MICHIGAN 48010

DETROIT OFFICE  
8525 LINCOLN AVENUE  
DETROIT, MICHIGAN 48202

April 22, 1987

Gary Klotz, Esq.  
Kewell & Rosenfeld

Troy, MI 48084

Dear Mr. Klotz:

I have been in contact with Mr. Joe Wyckoff, Chief Operating Officer, Detroit Area Council, Boy Scouts of America. I was advised to contact you in reference to legal matters which concern the B.S.A.

Our firm has been retained by [REDACTED] in reference to potential legal action on behalf of his son. The action results from an incident on May 12, 1984, in which [REDACTED] was sexually assaulted by Mr. Robert J. Vehoski, a Boy Scout leader.

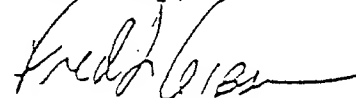
Mr. Vehoski was a scout leader for Troop 526, sponsored by the Ford Memorial Methodist Church. Vehoski pled guilty to Attempted Criminal Sexual Conduct II, in Wayne County Circuit Court, approximately November, 1984, as a result of the above incident.

Our client believes the incident was able to occur in an atmosphere which evolved from the scoutmaster/scout relationship.

Please advise me what legal relationship you believe exists between the Boy Scouts of America and its scout leaders. What would be their response to vicarious liability?

I thank you in advance for your time and attention to this matter.

Sincerely,



Fred L. Gibson

FLG/nad  
cc: [REDACTED]

CONF012976

7/11

CONFIDENTIAL

LEADERSHIP EVALUATION FORM

Person Involved: Robert Veloski District: NORTH WEST  
 Scouting Position: Scoutmaster Unit: 1526  
 Nature of Recommendation or Complaint: (Be as specific as possible. Attach additional paper if necessary.) 26 June 84

[REDACTED]

Submitted by: [REDACTED] (Need not be signed)  
 Address: [REDACTED]  
 City: DETROIT State: MICH Zip: 48205 Phone: [REDACTED]  
 Scouting Affiliation: District Executive  
 Date Submitted: 7/11/84

**INSTRUCTIONS:** The information on this form will be kept CONFIDENTIAL and is for Detroit Area Council use only.  
 Please return completed forms to: The Scout Executive or President, Detroit Area Council, Boy Scouts of America, [REDACTED] Detroit, Michigan 48208. Please mark your envelope: "Personal and Confidential."  
 If you sign the form, the Detroit Area Council will apprise you of any action taken relative to your recommendation or complaint.

AKG-13

CONFIDENTIAL

LEADERSHIP EVALUATION FORM

Person Involved: Robert Vehoski District: NORTHWEST  
 Scouting Position: Scoutmaster Unit: T 526 FORD MEMORIAL METHODIST CHURCH

Nature of Recommendation or Complaint: (Be as specific as possible. Attach additional paper if necessary.)

On June 26, 1984 [REDACTED] made a complaint with the Detroit Police Dept. He stated his Scoutmaster (Robert Vehoski) ~~he~~ had sexually assaulted him on various occasions at several locations. An investigation into that complaint was conducted by the Sex Crimes Unit of the Detroit Police Dept. As a result of that investigation a criminal warrant was issued against Robert Vehoski charging him with 2nd Degree Criminal Sexual Conduct. On July 9, 1984 an Examination was held in Recorder's Court and Robert Vehoski was bound over for trial. The Trial date is scheduled for Sept. 27, 1984 in Judge Hobson's Court.

Submitted by: \_\_\_\_\_ (Need not be signed)

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ Phone: \_\_\_\_\_

Scouting Affiliation: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

INSTRUCTIONS: The information on this form will be kept CONFIDENTIAL and is for Detroit Area Council use only.

Please return completed forms to: The Scout Executive or President, Detroit Area Council, Boy Scouts of America, [REDACTED] Detroit, Michigan 48208. Please mark your envelope: "Personal and Confidential."

If you sign the form, the Detroit Area Council will apprise you of any action taken relative to your recommendation or complaint.

Detroit Police Dept.

[REDACTED]  
Detroit, Mich. 48226  
Sex Crime Unit



The Scout Executive or President  
Detroit Area Council  
Boy Scouts of America  
[REDACTED] 48208

[REDACTED] 48208

PERSONAL AND CONFIDENTIAL

Nov 26

CONFIDENTIAL

LEADERSHIP EVALUATION FORM

Person Involved: \_\_\_\_\_ District: NORTHWEST  
 Scouting Position: \_\_\_\_\_ Unit: T-526  
 Nature of Recommendation or Complaint: (Be as specific as possible. Attach additional paper if necessary.)

Submitted by: Peter Boguslawski (Need not be signed)  
 Address: \_\_\_\_\_  
 City: Detroit State: Mich Zip: 48228 Phone: 573-3116  
 Scouting Affiliation: \_\_\_\_\_  
 Date Submitted: \_\_\_\_\_

**INSTRUCTIONS:** The information on this form will be kept CONFIDENTIAL and is for Detroit Area Council use only.  
 Please return completed forms to: The Scout Executive or President, Detroit Area Council, Boy Scouts of America, \_\_\_\_\_ Detroit, Michigan 48208. Please mark your envelope: "Personal and Confidential."  
 If you sign the form, the Detroit Area Council will apprise you of any action taken relative to your recommendation or complaint.

Jacket No. 84-03932  
Prob. Case No. \_\_\_\_\_

OF THE CITY OF DETROIT  
ORDER OF PROBATION

P.O. \_\_\_\_\_  
Div. \_\_\_\_\_

People of the State of Michigan,  
Plaintiff

vs.

Complainant

ROBERT J. VEHOUSKI

Defendant

Address

Phone

Address \_\_\_\_\_ D.O.B. 4/22/37 Phone \_\_\_\_\_ S.S. # \_\_\_\_\_

At a session of court held in Detroit on the 26 day of NOV 1984, defendant was convicted  
of having committed the crime of ATT CSC 20.

IT IS THEREFORE ORDERED: That defendant on this 26 day of NOVEMBER 1984 be placed  
on probation for a term of FIVE YEARS

The conditions of said probation are as follows:

1. That probationer shall serve first NONE of probation period in ☐ Detroit House of Correction  
☐ Wayne County Jail
2. That probationer shall pay the fine and/or costs as follows:

16.50/month TOTAL FINES & COSTS \$165/YR.

That probationer shall make restitution as follows: NONE

☐ To be determined.

(a) Court appointed attorney \$ NONE

TOTAL  
RESTITUTION

\$

4. ☐ Family Support

☐ Wage Assignment NOT TO BE ALONE WITH ANY CHILD EXCEPT OWN.

5. Special Instructions: RECORDER'S CRT PSYCHIATRIC CLINIC PROGRAM

THERAPY AS DIRECTED; GROUP THERAPY FOR SEX OFFENDERS  
PAYS COST OF THERAPY FOR COMPLAINANT OR ANY MEMBER OF  
FAMILY. NO LONGER BE INVOLVED WITH SCOUTS OR LITTLE LEAGUE  
OR SIMILAR ORGANIZATION

THE SPECIAL CONDITIONS OF PROBATION:

- A. Probationer shall not violate any State or Federal criminal law or any ordinance of any municipality, nor attempt to do so, nor make any preparation leading to the same.
- B. During the term of probation, Probationer shall not leave the State without the consent of the Court.
- C. Probationer shall make a report to the probation officer, either in person or in writing, weekly, or as often as the Court may require.
- D. Probationer shall cooperate at all times with the probation officer and conform to the following regulations and suggestions: To keep regular and reasonable hours; To avoid questionable associates and places; To seek and retain regular employment; To endeavor to accumulate some savings; To take advantage, if possible, of educational and other facilities for self-improvement. In case of doubt, consult the probation officer.

All Costs and Restitution are payable thirty (30) days prior  
to expiration date of this Order unless otherwise noted.

X B. Jurem  
Judge, Recorder's Court

Copy served and receipt thereof acknowledged

X Robert Vehouski  
Defendant's Signature

Date NOVEMBER 26 1984

COURT COPY

CONF012981

## The Recorder's Court of the City of Detroit

STATE OF MICHIGAN, }  
COUNTY OF WAYNE, } ss.  
CITY OF DETROIT, }

I, George L. Gish, Clerk of the Recorder's Court of the City of Detroit,  
do hereby certify that the foregoing is correctly taken and copied from the original record in the  
case of People vs. Robert J. Vehoski Case No. 84-03932  
now remaining in my office, and of record in said Court, and that the same has been examined and  
compared by me with the original of said record in said cause, and that it is a correct transcript  
therefrom, and of the whole of such original record.

In Testimony Whereof, I have hereunto set my hand and affixed the

seal of said Court at Detroit, this first  
day of February in the year one  
thousand nine hundred and eighty-five



George L. Gish, Clerk

Per

*CDM*

Deputy Clerk